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**NUS CORPORATION  
SUPERFUND DIVISION**

**INTERNAL CORRESPONDENCE**

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MEMBERS OF INTERAGENCY TASK FORCE WORKING  
GROUP ON PERMITTING REQUIREMENTS AND  
REGULATORY CONTROLS: NEW BEDFORD SUPERFUND  
PROJECT.

**DATE:** OCTOBER 31, 1983

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**COPIES:** Superfund Records Center

**SUBJECT:** EXCLUSION CRITERIA FOR SITING STUDY  
PROJECT NO. 0725.06

SITE: New Bedford

BREAK: 3.01

OTHER: 46765

Many of the alternatives preliminarily identified for remediating the environmental problems within the New Bedford environs involve the removal of contaminated sediment and soil. The successful implementation of any such alternative requires permitted sites for the secure and indefinite containment of contaminated materials. The initial task in site selection is best-termed a "critical-flaw" analysis, in which available information for the entire area under consideration is reviewed for the purpose of eliminating any areas that involve features prohibitive to waste disposal site development.

A cursory review of a limited number of site-specific and non-site-specific sources has revealed an initial list of features which are typically used to eliminate large areas from consideration, and which appear to be easily obtainable through existing literature. Included below is the proposed list of features, arranged in order of increasing resolution, which can be used to eliminate successively smaller areas and roughly pinpoint specific boundaries for prospective sites:

1. Locations outside a ten mile radius from the harbor area;
2. Watersheds from which public drinking water supplies are withdrawn from either surface water bodies or subsurface aquifers;
3. Heavily developed and densely populated areas;
4. State parks, State Wildlife Management Areas, and other state lands not otherwise designated for multiple use;
5. Unique and regionally significant, environmentally sensitive habitats, including inventoried wetlands and watersheds of coastal rivers and streams considered to have a high potential for anadromous fish restoration;

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6. Areas containing a high density of deep coal mines or abandoned oil wells;
7. Areas in which RCRA or TSCA criteria for soil properties, topography, distance to groundwater tables and surface water bodies, or other factors cannot be met by applying acceptable engineering practices.
8. Areas with boundaries closer than 1000 feet to any private water-supply well (criteria established by Malcolm Pirnie Inc., 1978, in a previous siting study);
9. Areas with boundaries closer than 1000 feet to private residences, historic sites, local parks, etc;
10. Areas with boundaries closer than 300 feet from any surface or groundwater supply used for irrigation or recreation (criteria established by Malcolm Pirnie Inc., 1978, in a previous siting study);
11. Areas with boundaries closer than 300 feet to fracture traces, faults, or other features which may indicate bedrock with high secondary permeability;
12. Local zoning ordinances;
13. Existence of any underground utilities; and
14. Inadequate site size or capacity.

A strict application of these exclusion criteria to the New Bedford area is likely to eliminate the entire area from consideration, particularly as regards the soil, groundwater, and wetlands issues. The purpose of this memo is to request consideration of these criteria prior to and at the November 8 meeting of the Working Group. What must be resolved at this point in the siting study is which are to be "exclusion", or "critical flaw: criteria, and which can be considered as simply inhibitory factors in subsequent, more detailed evaluations of potential disposal sites. Your input on this matter will be greatly appreciated.

JGY:snp